

RETURN DATE: SEPTEMBER 27, 2016

STATE OF CONNECTICUT  
EX REL. GEORGE JEPSEN,  
ATTORNEY GENERAL

:

SUPERIOR COURT

:

v.

:

JUDICIAL DISTRICT OF HARTFORD  
AT HARTFORD

:

ALPHAH EAST

:

AUGUST 2, 2016

## COMPLAINT

1. This is an action under Conn. Gen. Stat. §1-110 et seq. seeking the revocation or reduction of the pension of a state or municipal employee who has been convicted of a crime related to state or municipal office. In particular, the complaint seeks the revocation or reduction of the pension of Defendant ALPHAH EAST, who was formerly employed by the State of Connecticut Judicial Branch as a probation officer, for the reasons pleaded below.

### I. THE PARTIES

2. The plaintiff is the STATE OF CONNECTICUT, acting on the relation of GEORGE JEPSEN, ATTORNEY GENERAL OF THE STATE OF CONNECTICUT. The Attorney General is expressly authorized by virtue of Conn. Gen. Stat. §1-110a(a) to bring actions such as this with respect to public officials and/or state or municipal employees who are convicted of or plead guilty or nolo contendere to any crime related to state or municipal office.

3. Defendant ALPHAH EAST is a natural person with a usual place of abode at 73 Myrtle Street, Meriden, Connecticut, 06451, who is currently incarcerated in the MacDougall-Walker Correctional Institution (Walker Building), 1153 East Street, South, Suffield, Connecticut, 06080.

**II. CAUSE OF ACTION —  
REVOCATION OR REDUCTION OF PENSION**

4. During the period of time from April 30, 2004 through February 17, 2010, Mr. East was employed by the State of Connecticut in a variety of capacities, first as a judicial marshal, then a bail commissioner and, finally, a probation officer. He held the probation officer position from 2006 to the termination of his state employment in 2010.

5. Defendant's employment as a probation officer in the Judicial Department constitutes service as a "state or municipal employee" within the meaning of Conn. Gen. Stat. §1-110(2).

6. Defendant has Tier IIA vested rights under the State Employee Retirement System. Accordingly, unless revoked or reduced by this Court, he is eligible to receive a state pension of approximately \$390 per month for life, beginning on January 1, 2043.

7. On January 11, 2010, Defendant was arrested and charged with Bribe Receiving, a felony violation of Conn. Gen. Stat. §53a-148. The charge flowed from an incident where Mr. East accepted bribes totaling \$13,500 (and solicited \$5000 more) from the father of a woman whose probation Mr. East was supervising in return for his promise to have the daughter's remaining probation terminated.

8. On March 22, 2016, Defendant pleaded guilty to the charge against him, and, on June 7, 2016, he was sentenced to 5 years' incarceration, suspended after 18 months, with 3 years' probation. Defendant was also ordered to pay \$13,500 in restitution to the father. This is reflected in the following case on file in the Superior Court for the Judicial District of Stamford: *State of Connecticut v. Alphah East*, # FST -CR10-0124859-T.

9. The charge of which Defendant was convicted constituted a "crime related to state or municipal office" within the meaning of Conn. Gen. Stat. §1-110(3)(C) in that it constitutes "bribery in connection with service as a public official or state or municipal employee."

10. Defendant was a public official and/or state or municipal employee convicted of a crime related to state or municipal office within the meaning of Conn. Gen. Stat. §1-110a(a) .

### **DEMAND FOR RELIEF**


WHEREFORE, pursuant to Conn. Gen. Stat. §§1-110a et seq., the STATE OF CONNECTICUT, acting on the relation of GEORGE JEPSEN, ATTORNEY GENERAL OF THE STATE OF CONNECTICUT, requests the following relief:

1. Revocation and/or reduction of any pension to which Defendant ALPHAH EAST is entitled on account of his service as a public official and/or state or municipal employee;
2. Such other relief as is just and equitable to effectuate the purposes of this action.

Dated at Hartford, Connecticut, this 2nd day of August, 2016.

**PLAINTIFF  
STATE OF CONNECTICUT**

BY: GEORGE JEPSEN  
ATTORNEY-GENERAL



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